

From: [Meredith Laws](#)  
To: [Bill Jacobs](#)  
Cc: [Russell Wasem](#); [Dan Peacock](#); [Jennifer Gaines](#); [John Hebert](#); [Kimberly Nesci](#); [Neil Anderson](#); [Rosanna Louie-Juzwiak](#)  
Subject: Re: Are all non-commensal rodents public health pests?  
Date: 06/02/2011 06:04 PM

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As a target pest, products labeled for moles are considered to be rodenticides. I don't believe we have separately distinguished mole products by referring to them by a different term. While I am aware that registrants had been required to submit efficacy data for moles in the past, I do not believe there is sufficient justification to support that position.

I see that chipmunks are listed on PRN 2002-1. What diseases are associated with chipmunks?

▼ [Bill Jacobs---06/01/2011 02:29:09 PM---See my earlier note regarding rodents. Typically, claims for controlling non-commensal rodents were](#)

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Cc: Meredith Laws/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Kimberly Nesci/DC/USEPA/US@EPA, Neil Anderson/DC/USEPA/US@EPA, Rosanna Louie-Juzwiak/DC/USEPA/US@EPA  
Date: 06/01/2011 02:29 PM  
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See my earlier note regarding rodents. Typically, claims for controlling non-commensal rodents were not on labels for commensal rodenticide baits prior to the RMD, so there was not much directed removal of claims involved. Most of the other types of rodents likely to be encountered in structural use situations also are of significance to public health.

Moles are insectivores (in a separate mammalian order from rodents).

▼ [Russell Wasem---06/01/2011 02:16:19 PM---Thanks Meredith. Rick has ask whether we have required efficacy data for non-commensal rodents that](#)

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Date: 06/01/2011 02:16 PM  
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Thanks Meredith. Rick has ask whether we have required efficacy data for non-commensal rodents that are not public health pests and then made the "may be used against X non-commensal rodent" be removed from the label when the registrant did not deliver the efficacy data.

▼ Meredith Laws---06/01/2011 02:05:42 PM---No - ex. moles We do not need efficacy for non-public health rodent pests.

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Date: 06/01/2011 02:05 PM  
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No - ex. moles

We do not need efficacy for non-public health rodent pests.

▼ Russell Wasem---06/01/2011 01:57:58 PM---This question came up in a conference call with ASPCRO. If not all non-commensal rodents are public

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Date: 06/01/2011 01:57 PM  
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This question came up in a conference call with ASPCRO. If not all non-commensal rodents are public health pests, why do we need efficacy data for them to be on the label?